

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
VICTORIA DAVIS
LOCKARD, ESQ.**

VICTORIA DAVIS LOCKARD, ESQ., being of full age, certifies as follows:

1. I am a Shareholder at Greenberg Traurig, LLP, and serve as counsel for Defendants Teva Pharmaceuticals USA, Inc., Actavis Pharma, Inc., and Actavis LLC. I make this Certification based on personal knowledge and in support of the TPP Trial Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude Deposition Designations.
2. Attached hereto as Exhibit A is a true and accurate copy of excerpts of the November 1, 2023 Hearing Transcript before Hon. Robert B. Kugler in this matter.
3. Attached hereto as Exhibit B is a true and accurate copy of a January 30, 2024 letter from Plaintiffs' counsel A. Slater to Defendants' counsel.

4. Attached hereto as Exhibit C is a true and accurate copy of a February 7, 2024 e-mail correspondence from Plaintiffs' counsel A. Slater to Defendants' counsel.

Dated: February 26, 2024

Respectfully submitted,

/s/ Victoria Davis Lockard

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 26, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Gerond J. Lawrence

Gerond J. Lawrence
Greenberg Traurig, LLP